

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RICHARD DENNIS, SONTERRA CAPITAL MASTER
FUND, LTD., FRONTPOINT FINANCIAL SERVICES
FUND, L.P., FRONTPOINT ASIAN EVENT DRIVEN
FUND, L.P., AND FRONTPOINT FINANCIAL HORIZONS
FUND, L.P., on behalf of themselves and all others similarly
situated,

Docket No. 16-cv-06496 (LAK)

Plaintiffs,

-against-

JPMORGAN CHASE & CO., JPMORGAN CHASE BANK,
N.A., JPMORGAN CHASE BANK, N.A. AUSTRALIA
BRANCH, BNP PARIBAS, S.A., BNP PARIBAS, AUSTRALIA
BRANCH, THE ROYAL BANK OF SCOTLAND GROUP
PLC, THE ROYAL BANK OF SCOTLAND PLC, RBS N.V.,
RBS GROUP (AUSTRALIA) PTY LIMITED, UBS AG, UBS
AG, AUSTRALIA BRANCH, AUSTRALIA AND NEW
ZEALAND BANKING GROUP LTD., COMMONWEALTH
BANK OF AUSTRALIA, NATIONAL AUSTRALIA BANK
LIMITED, WESTPAC BANKING CORPORATION,
DEUTSCHE BANK AG, DEUTSCHE BANK AG,
AUSTRALIA BRANCH, HSBC HOLDINGS PLC, HSBC
BANK AUSTRALIA LIMITED, LLOYDS BANKING GROUP
PLC, LLOYDS BANK PLC, LLOYDS TSB BANK PLC,
AUSTRALIA, MACQUARIE GROUP LTD., MACQUARIE
BANK LTD., ROYAL BANK OF CANADA, RBC CAPITAL
MARKETS LLC, ROYAL BANK OF CANADA, AUSTRALIA
BRANCH, MORGAN STANLEY, MORGAN STANLEY
AUSTRALIA LIMITED, CREDIT SUISSE GROUP AG,
CREDIT SUISSE AG, ICAP PLC, ICAP AUSTRALIA PTY
LTD., TULLETT PREBON PLC, TULLETT PREBON
(AUSTRALIA) PTY LTD., AND JOHN DOES NOS. 1-50.

Defendants.

**UNOPPOSED MOTION FOR
CONDITIONAL CLASS
CERTIFICATION FOR
PURPOSES OF CLASS ACTION
SETTLEMENT WITH
JPMORGAN CHASE & CO. AND
JPMORGAN CHASE BANK, N.A.**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Joint Declaration of Vincent Briganti and Christopher Lovell, and the exhibits attached thereto, including the Stipulation and Agreement of Settlement as to Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, “JPMorgan”), Representative Plaintiffs, by and through their undersigned counsel, will move this Court, before the Honorable Lewis A. Kaplan, Courtroom 21B, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007 on a date and time to be set by the Court, for an order, inter alia: (i) conditionally certifying the Class for settlement pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3) subject to later, final approval of such Class for settlement; (ii) conditionally appointing Lowey Dannenberg, P.C. and Lovell Stewart Halebian Jacobson LLP as Class Counsel for the Class; (iii) granting leave to Representative Plaintiffs to develop a plan of distribution and a notice plan for later approval by the Court; (iv) appointing Citibank, N.A. as Escrow Agent for purposes of the Settlement Fund defined in the Settlement Agreement; and (v) staying all proceedings against JPMorgan until the Court renders a final decision on approval of the Agreement.

Dated: November 21, 2018
White Plains, New York

By: /s/ Vincent Briganti
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By: /s/ Christopher Lovell
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